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Food Safety And Inspection Service
Technical Service Center
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AUDIT REPORT FOR CANADA

April 4 through April 20, 2000

INTRODUCTION

Background

This report reflects information that was obtained during an audit of Canada's meat/poultry inspection system from April 4 through 20, 2000. Eight of the four hundred sixty establishments certified to export meat/poultry to the United States were visited. Seven of these were slaughter establishments; one was conducting processing operations.

The last audit of the Canadian meat inspection system was conducted in October 1998. At the time, establishments were not rated because of the system review process. No system failure was reported at that time. HACCP implementation was adequate and satisfactory in the one establishment required to have a mandatory HACCP program. SSOP was performed satisfactorily. The generic *E. coli* testing program was satisfactory, with the exception of Establishment 38, which did not have random selection of carcasses, and Establishment 270A, which did not have a process control chart showing the 13 most recent test results. The *Salmonella* testing program was basically the same as in the U.S., with the exception that the establishment personnel, rather than the inspection personnel, collect the samples. The only other deficiency noticed was that in one slaughter establishment, the stunning operator was inexperienced and it was necessary to have multiple stunning applications to accomplish complete stunning.

From January 1 through March 31, 2000, Canadian establishments exported 448,926,573 pounds of meat and poultry products to the U.S. Port-of-entry rejections were 395,402 pounds of meat and poultry products. From January 1 through December 31, 1999, Canadian establishments exported 1,680,960,977 pounds of meat and poultry products to the U.S. with the rejection of 2,895,308 pounds at the port-of-entry.

PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with Canada's national meat/poultry inspection officials to discuss oversight programs and practices, including enforcement activities. The second entailed an audit of a selection of records in the meat/poultry inspection headquarters facilities preceding the on-site visits. Establishments were selected randomly for record audits and on-site audits from the central and western region of Canada. The third was conducted by on-site visits to establishments. The fourth was a visit to one laboratory, culturing samples for the presence of microbiological contamination with food pathogens.

Program effectiveness determinations focused on five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOPs), (2) animal disease controls, (3) residue controls, (4) slaughter/ processing controls, including the implementation and operation of Hazard Analysis and Critical Control Point (HACCP) systems and the *E. coli* testing program, and (5) enforcement controls, including the testing program for *Salmonella* species. Canada's inspection system was assessed by evaluating these five risk areas.

During all on-site establishment visits, the auditor evaluated the nature, extent, and degree to which findings impacted on food safety and public health, as well as overall program delivery. The auditor also determined if establishment and inspection system controls were in place. Establishments that do not have effective controls in place to prevent, detect and eliminate product contamination/adulteration are considered unacceptable and therefore ineligible to export products to the U.S., and are delisted accordingly by the country's meat inspection officials.

RESULTS AND DISCUSSION

Summary

Based on the performance of the individual establishments, Canada's "In-Plant Inspection System Performance" was evaluated as In-Plant System Controls In Place.

Effective inspection system controls were found to be in place in all eight establishments audited. Details of audit findings, including compliance with HACCP, SSOPs, and testing programs for *Salmonella* and generic *E. coli* are discussed later in this report.

As stated above, there were no system failures identified during the last audit of the Canadian meat inspection system, conducted in October 1998.

During the 1998 audit, there were no HACCP-implementation deficiencies found in the review of the one establishment required to have a HACCP program. During this new audit, implementation of the required HACCP programs was found to be deficient in one of the eight establishments visited. Details are provided in the Slaughter/ Processing Controls section later in this report.

Entrance Meeting

On April 4 and 5, an entrance meeting was held at the Ottawa offices of the Canadian Food Inspection Agency (CFIA), and was attended by Dr. Mervyn F. Baker, Director, Food of Animal Origin Division; Dr. Robert Charlebois, Acting National Program Manager, Livestock and Meat Processing; Dr. Bertrand St-Arnaud, Chief Export Programs; Ms. Susanne N. Frost, Director, Enforcement and Investigation Services;
Dr. Eli Neidert, Chief, Program Development and Evaluation Chemical Residue Programs, Food Laboratory, Laboratory Services Division, Laboratory Directorate;
Dr. Doug Scott, Acting Chief, Red Meat Programs; Dr. Katherine Scott, Operations Program Coordinator-Animal Products Operations Coordination; Dr. Barbara Lee,

Accreditation/Special Projects Laboratories Directorate; Mr. Bernard LeBlanc, Food Program Officer; Dr. Lucie Brisebois, National Training Coordinator; Dr. Richard Arsenault, Acting Chief, Meat Prrocessing Inspection Programs; and Dr. Oto Urban, International Audit Staff Officer. Topics of discussion included the following:

1. Organizational structure and function of CFIA.

2. Recent changes in the CFIA (animal and plant products under one umbrella, laboratory system of food inspection under one director).

3. Structure and function of enforcement and investigation services (EIS) and decision-making chain for enforcement approval.

4. Labeling issues (negative claims, etc.).

5. Animal traceback program development.

6. Export certification and other issues related to the export of product to the U.S.

7. Canadian national meat/poultry inspection program training.

Headquarters Audit

There had been some changes in the organizational structure since the last U.S. audit of Canada's inspection system in October 1998. Work continues to unify federal legislation for animal and plant products.

To gain an accurate overview of the effectiveness of inspection controls, FSIS requested that the audits of the individual establishments be led by the inspection officials who normally conduct the periodic reviews for compliance with U.S. specifications. The FSIS auditor (hereinafter called "the auditor") observed and evaluated the process.

The auditor conducted a review of inspection system documents pertaining to the establishments listed for records review. This records review was conducted at the headquarters in Ottawa. The records review focused primarily on food safety hazards and included the following:

- Internal review reports.
- Supervisory visits to establishments that were certified to export to the U.S.
- Training records for inspectors and laboratory personnel.
- Label approval records such as generic labels, and animal raising claims.
- New laws and implementation documents such as regulations, notices, directives and guidelines.
- Sampling and laboratory analyses for residues.
- Pathogen reduction and other food safety initiatives such as SSOPs, HACCP programs, generic *E. coli* testing and *Salmonella* testing.
- Sanitation, slaughter and processing inspection procedures and standards.

- Control of products from livestock with conditions such as tuberculosis, cysticercosis, etc., and of inedible and condemned materials.
- Export product inspection and control including export certificates.
- Enforcement records including examples of criminal prosecution, consumer complaints, recalls, seizure and control of noncompliant product, and withholding, suspending, withdrawing inspection services from or delisting an establishment that is certified to export product to the United States.

No concerns arose as a result of the examination of these documents.

Government Oversight

All inspection veterinarians and inspectors in establishments certified by Canada as eligible to export meat/poultry products to the United States were full-time CFIA employees, receiving no remuneration from either industry or establishment personnel.

Establishment Audits

Four hundred sixty establishments were certified to export meat and/or poultry products to the United States at the time this audit was conducted. Eight establishments were visited for on-site audits. In all eight establishments visited, both CFIA inspection system controls and establishment system controls were in place to prevent, detect and control contamination and adulteration of products.

Laboratory Audit

During the laboratory audit, emphasis was placed on the application of procedures and standards that were equivalent to U.S. requirements. Information about the following risk areas was also collected:

1. Government oversight of accredited and private laboratories.
2. Intra-laboratory quality assurance procedures, including sample handling.
3. Methodology.

The Laboratory Services Division of the Canadian Food Inspection Agency in Ottawa was audited on April 6, 2000. This laboratory is the CFIA microbiology accreditation center and was not conducting testing of *Salmonella* and generic *E. coli* samples. Information available and discussed at this laboratory indicated that effective controls were in place for sample handling and frequency, timely analysis, data reporting, tissue matrices for analysis, equipment operation and printouts, minimum detection levels, recovery frequency, percent recoveries, and corrective actions. The methods used for the analyses were acceptable.

The method used to test for *E. coli* is the same as in the U.S., while methods used for detection of *Salmonella* and *Listeria monocytogenes* were different from those used in the U.S., but were approved by Health Canada. Accredited laboratories that perform Salmonella testing for purposes demonstrating compliance with the U.S. performance standard are using

the FSIS-approved method. The check sample program is performed properly. Any analyst that fails three check samples will be removed from testing the failed bacterium and assigned to the testing of a different bacterium.

Canada's microbiological testing for *Salmonella* was being performed in private accredited laboratories. The criteria established for the use of private laboratories under FSIS's Pathogen Reduction/HACCP rule are:

1. The laboratories were accredited/approved by the government.
2. The laboratories had properly trained personnel, suitable facilities and equipment, a written quality assurance program, and reporting and record-keeping capabilities.
3. Results of analyses were being reported simultaneously to the government and establishment.

A private laboratory for bacteriology testing was not visited during this audit.

Establishment Operations by Establishment Number

The following operations were being conducted in the nine establishments:

Establishments 7 - Pork slaughter, boning and cutting
Establishment 11 - Beef, veal and lamb slaughter and boning, cutting, grinding (turkey, chicken)
Establishment 35E - Pork boning
Establishment 69 - Pork slaughter, boning, cutting (beef), grinding (chicken), dicing (veal), cured smoked product, cooked sausage, loaves and mechanically separated products
Establishment 270 - Beef boning, pork cutting, chicken grinding, turkey dicing, cured smoked products, cooked sausages, loaves, and mechanically separated product
Establishment 513 - Pork slaughter, boning and cutting (deer)
Establishment 597 - Beef slaughter
Establishment 930 - Beef slaughter, boning, cutting and dicing

SANITATION CONTROLS

Based on the on-site audits of establishments, Canada's inspection system had controls in place for:

1. Basic establishment facilities
2. Condition of facilities and equipment
3. Product protection and handling
4. Establishment sanitation program

Sanitation Standard Operating Procedures (SSOPs)

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment A).

The SSOPs were found to meet the basic FSIS regulatory requirements, with only occasional minor variations, such as, the description of the corrective action and initials of the responsible personnel were missing in one establishment.

The CFIA has been performing a *Listeria monocytogenes* control program based on the testing of the environment of establishments manufacturing ready-to-eat meat products. Each establishment that manufactures ready-to-eat meat product is sampled twice per year. If results are negative, the next tests take place in six months. If the second or third round of individual swab results are positive, an in-depth review of the establishment is scheduled and end-product "hold and test" procedures may be initiated, depending on the results of the in-depth review.

Pest control program

The rodent control program record keeping needed improvement in two establishments. There was an open passage between the kill floor and outside premises through the hide removing area in one establishment. Corrective action was scheduled immediately.

Cross-Contamination

The knife was not sanitized by the operator after each exsanguination procedure in one establishment. In another establishment, after the stunning procedure the operator was cutting through the skin and muscle at the same time without sanitizing his knife. The procedure was corrected immediately by the establishment management.

Personnel Hygiene and Practices

In one establishment, employees were observed to fail to wash their hands after contaminating them, before continuing to work with exposed product. Corrective action was immediate.

ANIMAL DISEASE CONTROLS

Canada's inspection system had controls in place to ensure adequate animal identification, ante-mortem and post-mortem inspection procedures and dispositions, condemned and restricted product control, and procedures for sanitary handling of returned and rework product.

There were reported to have been no outbreaks of animal diseases with public-health significance since the previous U.S. audit. Canada is developing an animal traceback system; presently it is functioning in beef and will be fully implemented by the end of the year.

RESIDUE CONTROLS

Canada's National Residue Testing Plan for 2000 was being followed, and was on schedule. The Canadian inspection system had adequate controls in place to ensure compliance with sampling and reporting procedures and storage and use of chemicals. The residue testing laboratory was not visited during this audit.

SLAUGHTER/PROCESSING CONTROLS

The Canadian inspection system had controls in place to ensure adequate animal identification, antemortem inspection procedures, antemortem disposition, humane slaughter with proper animal handling, postmortem inspection procedures, and postmortem disposition.

HACCP Implementation

All establishments approved to export meat/poultry products to the U.S. are required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment B).

The HACCP programs were found to meet the basic FSIS regulatory requirements, except in one establishment, which did not have any CCPs listed for their two HACCP plans. The establishment claimed that all food safety hazards have been covered under their Prerequisite Program, so they will ask for approval of a CCP-free HACCP system. These HACCP plans had not been reviewed and recognized by CFIA at the time of the audit. During the audit, CFIA officials disapproved the CCP-free HACCP system.

Pre-shipment records review are performed in both prerequisite and HACCP plans. The establishment must specify the frequency at which records will be verified. The frequency of this review is not necessarily timed to coincide with the shipment of product but must be of a frequency which assures that proper monitoring of activities and appropriate record keeping is taking place.

Testing for Generic *E. coli*

Canada has adopted the FSIS regulatory requirements for *E. coli* testing. Seven of the establishments audited were required to meet the basic FSIS regulatory requirements for generic *E. coli* testing, and were audited and evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment C).

The *E. coli* testing programs were found to meet the basic FSIS regulatory requirements.

Additionally, establishments had adequate controls in place to prevent meat products intended for Canadian domestic consumption from being commingled with products eligible for export to the U.S.

ENFORCEMENT CONTROLS

Inspection System Controls

Except as noted below, the CFIA inspection system controls [ante- and post-mortem inspection procedures and dispositions, control of restricted product and inspection samples, control and disposition of dead, dying, diseased or disabled animals, boneless meat reinspection, shipment security, including shipment between establishments, prevention of commingling of product intended for export to the United States with domestic product, monitoring and verification of establishment programs and controls (including the taking and documentation of corrective actions under HACCP plans), inspection supervision and documentation, the importation of only eligible livestock or poultry from other countries (i.e., only from eligible countries and certified establishments within those countries), and the importation of only eligible meat or poultry products from other counties for further processing] were in place and effective in ensuring that products produced by the establishment were wholesome, unadulterated, and properly labeled. In addition, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

Testing for *Salmonella* Species

Seven of the establishments audited were required to meet the basic FSIS regulatory requirements for *Salmonella* testing, and were evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment D).

Canada has adopted the FSIS regulatory requirements for *Salmonella* testing with the exception of the following equivalent measures:

SAMPLE COLLECTOR: Establishment Takes Samples. The criteria used for equivalence decisions for use of establishment employees in lieu of government employees are:

- There is a clearly written sampling plan with instructions for sample collection and processing that will be universally followed.
- The government has a means of ensuring that establishment sample collection activities are appropriate.
- The government uses test results to monitor establishment performance over time.
- The government takes immediate action any time an establishment fails to meet a *Salmonella* performance standard.

LABORATORIES: Private Laboratories. The criteria used for equivalence decisions for the use of private laboratories in lieu of government laboratories are:

- The laboratory is accredited/approved by the government, accredited by a third-party accrediting organization with oversight by the government, or a government contract laboratory.
- The laboratory has properly trained personnel, suitable facilities and equipment, a written quality assurance program, and reporting and record-keeping capabilities.
- Results of analyses are reported to the government or simultaneously to the government and the establishment.

Species Verification Testing

At the time of this audit, Canada was not exempt from the species verification-testing requirement. The auditor verified that species verification testing was being conducted in accordance with FSIS requirements.

Monthly Reviews

These reviews were being performed by the Canadian equivalent of Circuit Supervisors. All were veterinarians (except during the processing establishment visit in Vancouver) with at least 10 years of experience. Different supervisors were reviewing establishments in different provinces.

The internal review program was applied equally to both export and non-export establishments. Internal review visits were announced in advance, and were conducted at least once in four months and sometimes two or three times within a month. The records of audited establishments were kept in the inspection offices of the individual establishments, and copies were also kept in the central CFIA offices in Ottawa, and were routinely maintained on file for a minimum of three years.

In the event that an establishment is found, during one of these internal reviews, to be out of compliance with U.S. requirements, and is delisted for U.S. export, before it may again qualify for eligibility to be reinstated, a regional office review and recommendation for re-listment is followed by the CFIA approving the establishment for export to the U.S.

After observing the internal reviewers' activities in the field, the auditor was confident in their professionalism, thoroughness, and knowledge of U.S. requirements, and in the effectiveness of Canada's internal review program as a whole.

The only exception was the "monthly supervisory reviews", which are considered to be inspections of the establishment by a program officer stationed usually at the regional or area office. Unlike the U.S., the CFIA has divided the supervision of inspection activities into two linked areas:

1. Operational supervision of staff (leave scheduling, grievances and personnel issues).

2. Program function supervision (clarification of program requirements and verification of program delivery).

The Animal Products (Meat Hygiene) Program Network officer who exercises functional program supervision for the establishment receives a copy of Form 1427 completed by the inspector-in-charge at the establishment. Inspectors are instructed to contact the program officer whenever a program issue is identified and whenever an establishment rating modification is required.

Based on the existence of these controls, the CFIA reduced the number of formal supervisory visits from 11 per year to four per year. This reduction took place over a number of years. The only province that did not perform any supervisory reviews in the last year was Manitoba.

Enforcement Activities

Canada's laws contain authorities at least equivalent to United States for enforcement of their meat and poultry acts. All establishments in Canada exporting to the U.S. are currently operating under HACCP systems. When a registered establishment wants to export meat or poultry products to the United States they must meet the U.S. regulatory requirements for HACCP, *E. coli,* and *Salmonella* performance standards. These regulatory requirements are contained in Canada's Meat Hygiene Manual. Canada had conducted pre-requisite programs that included: premises, transportation and storage, equipment, personnel, sanitation and pest control, and recalls, followed by HACCP recognition activities.

Exit Meetings

An exit meeting was conducted in Ottawa on April 20. The Canadian participants were: Dr. Mervyn F. Baker, Director, Food of Animal Origin Division; Dr. Robert Charlebois, Acting National Program Manager, Livestock and Meat Processing, Food of Animal Origin Division; Dr. Bertrand St-Arnaud, Chief, Export Programs, Food of Animal Origin Division; Dr. Doug Scott, Acting Chief, Red Meat Programs, Food of Animal Origin Division; Dr. Katherine Scott, Operations Program Coordinator-Animal Products Operations Coordination, Food of Animal Origin Division; Dr. Richard Arsenault, Acting Chief, Meat Processing Inspection Program, Food of Animal Origin Division; Dr. George Jiri Furych, National Veterinary Supervisor, Food of Animal Origin Division; and Dr. Oto Urban, International Review Staff Officer. The audit findings and CFIA recommendations for correction were discussed, including the following:

1. CFIA reduced supervisory reviews from 11 per year to four per year to allow program staff in area and regional offices to take on increased responsibilities for program design and program support activities. CFIA claimed that program supervisory staff are generally spending more time in establishments than four times a year (time required for supervisory reviews) due to their involvement in program support activities.

2. HACCP plans that had no CCP. To be considered to be eligible to export to the U.S., the CFIA requires establishments to operate under a comprehensive HACCP system. During recognition activities it was found that one establishment placed antemortem and dressing controls incorrectly within the pre-requisite programs. This was confirmed during the on-site U.S. equivalency audit. Critical Control Points were missing but critical limits were set for particular activities. Following this finding, the Food of Animal Origin Division took immediate corrective action to clarify the national requirement for CCPs in slaughter models.

3. Establishment employee training in sanitation requirements was recommended. In two occasions, establishment employees were observed not to sanitize their knives either after

each exsanguination procedure; and after stunning, an employee was observed cutting through the skin and muscle at the same time without sanitizing his knife. CFIA officials recommended immediate corrective action to prevent these deficiencies in the future.

CONCLUSION

The inspection system of Canada was found to have effective controls to ensure that product destined for export to the United States was produced under conditions equivalent to those which FSIS requires in domestic establishments. All eight establishments were evaluated as acceptable. The deficiencies encountered during the on-site establishment audits were adequately addressed to the auditor's satisfaction.

Dr. Oto Urban (Signed) *Dr. Oto Urban*
International Audit Staff Officer

ATTACHMENTS

A. Data collection instrument for SSOPs
B. Data collection instrument for HACCP programs
C. Data collection instrument for *E. coli* testing.
D. Data collection instrument for *Salmonella* testing
E. Laboratory audit form
F. Individual Foreign Establishment Audit Forms
G. Written Foreign Country's Response to the Draft Final Audit Report

Attachment A

Data Collection Instrument for SSOPs

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written SSOP program.
2. The procedure addresses pre-operational sanitation.
3. The procedure addresses operational sanitation.
4. The pre-operational procedures address (at a minimum) the cleaning of food-contact surfaces of facilities, equipment, and utensils.
5. The procedure indicates the frequency of the tasks.
6. The procedure identifies the individuals responsible for implementing and maintaining the activities.
7. The records of these procedures and any corrective action taken are being maintained on a daily basis.
8. The procedure is dated and signed by the person with overall on-site authority.

The results of these evaluations were as follows:

Est. #	1.Written program addressed	2. Pre-op sanitation addressed	3. Oper. Sanitation addressed	4. Contact surfaces addressed	5. Fre-quency addressed	6. Respons-ible indiv. identified	7. Docu-mentation done daily	8. Dated and signed
11	√	√	√	√	√	√	√	√
7	√	√	√	√	√	√	√	√
35E	√	√	√	√	√	√	√	√
69	√	√	√	√	√	√	√	√
597	√	√	√	√	√	√		√
93	√	√	√	√	√	√	√	√
513	√	√	√	√	√	√	√	√
270	√	√	√	√	√	√	No	√

Est. 270 (Item 7) - The corrective action and initials of the responsible person were not indicated clearly.

Attachment B

Data Collection Instrument for HACCP Programs

Each of the establishments approved to export meat products to the U.S. was required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. The establishment has a flow chart that describes the process steps and product flow.
2. The establishment had conducted a hazard analysis.
3. The analysis includes food safety hazards likely to occur.
4. The analysis includes the intended use of or the consumers of the finished product(s).
5. There is a written HACCP plan for each product where the hazard analysis revealed one or more food safety hazard(s) reasonably likely to occur.
6. All hazards identified in the analysis are included in the HACCP plan; the plan lists a CCP for each food safety hazard identified.
7. The HACCP plan specifies critical limits, monitoring procedures, and the monitoring frequency performed for each CCP.
8. The plan describes corrective actions taken when a critical limit is exceeded.
9. The HACCP plan was validated using multiple monitoring results.
10. *The HACCP plan lists the establishment's procedures to verify that the plan is being effectively implemented and functioning and the frequency for these procedures.*
11. The HACCP plan's record-keeping system documents the monitoring of CCPs and/or includes records with actual values and observations.
12. The HACCP plan is dated and signed by a responsible establishment official.

The results of these evaluations were as follows:

Est. #	1. Flow diagram	2. Hazard analysis conducted	3. All hazards identified	4. Use & users included	5. Plan for each hazard	6. CCPs for all hazards	7. Monitoring is specified	8. Corr. actions are described	9. Plan validated	10.Adequate verific. procedures	11.Adequate documentation	12. Dated and signed
11	√	√	√	√	√							
7	√	√	√	√	√	no	√	√	√	√	no	√
35E	√	√	√	√	√	√	√	√	√	√	√	√
69	√	√	√	√	√	√	√	√	√	√	√	√
597	√	√	√	√	√	√		√	√	√	√	
93	√	√	√	√	√	√	√	√	√	√	√	√
513	√	√	√	√	√	√	√	√	√	√	√	√
270	√	√	√	√	√	√	no	√	√	√	√	√

Est. 7 (Items 6 and 11) - CCP-free HACCP program
Est. 270 (Item 11) - Monitoring frequencies were sometimes indicated other time not

Attachment C

Data Collection Instrument for Generic *E. coli* Testing

Each establishment (except Est. 270, which was a processing operation) was evaluated to determine if the basic FSIS regulatory requirements for generic *E. coli* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written procedure for testing for generic *E. coli.*
2. The procedure designates the employee(s) responsible to collect the samples.
3. The procedure designates the establishment location for sample collecting.
4. The sample collection is done on the predominant species being slaughtered.
5. The sampling is done at the frequency specified in the procedure.
6. The proper carcass site(s) and/or collection methodology (sponge or excision) is being used for sampling.
7. The carcass selection is following the random method specified in the procedure or is being taken randomly.
8. The laboratory is analyzing the sample using an AOAC Official Method or an equivalent method.
9. The results of the tests are being recorded on a process control chart showing the most recent test results.
10. The test results are being maintained for at least 12 months.

Est. #	1.Written procedure	2. Sampler designated	3.Sampling location given	4. Predomin. species sampled	5. Sampling at the req'd freq.	6. Proper site or method	7. Sampling is random	8. Using AOAC method	9. Chart or graph of results	10. Results are kept at least 1 yr
11	√	√	√	√	√	√	√	√	√	√
7	√	√	√	√	√	√	√	√	√	N/A
35E	√	√	√	√	√	√	√	√	√	√
69	√	√	√	√	√	√	√	√	√	√
93	√	√	√	N/A	√	√	√	√	√	√
597	√	√	√	√	√	√	√	√		√
513	√	√	√	√	√	√		√		√
270	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Est. 7 (Item 10) - Establishment has been operating only 7 months.
Est. 93(Item 4) - Only one species was slaughtered in this establishment
Eat. 270 - All processing establishment

Attachment D

Data Collection Instrument for *Salmonella* testing

Each slaughter establishment was evaluated to determine if the basic FSIS regulatory requirements for *Salmonella* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. Salmonella testing is being done in this establishment.

2. Carcasses are being sampled.

3. Ground product is being sampled.

4. The samples are being taken randomly.

5. The proper carcass site(s) and/or collection of proper product (carcass or ground) is being used for sampling.

6. Establishments in violation are not being allowed to continue operations.

The results of these evaluations were as follows:

Est. #	*1. Testing as required*	*2. Carcasses are sampled*	3. Ground product is sampled	4. Samples are taken randomly	5. Proper site and/or proper prod.	6. Violative est's stop operations
11	√	no		√	√	√
7	√		N/A	√	√	√
35E	√	√		√	√	√
69	√	√		√	√	√
597	√	√	N/A	√	√	√
93	√	No		√	√	√
513	√	√	no		√	√
270	N/A	N/A	N/A	N/A	N/A	N/A